Jeffery T. Martin, Jr., VSB #71860 Martin Law Group, P.C. 8065 Leesburg Pike, Suite 750 Vienna, VA 22182 703-834-5550 Office 703-223-1822 Direct Jeff@martinlawgroupva.com Counsel for the Debtor

# UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA (Alexandria)

In re:	)	
	)	Case No. 23-10566-KHK
EAGLE PROPERTIES AND INVESTMENTS,	)	
LLC,	)	Chapter 11
	)	-
Debtor.	)	
	)	

## THIRD STIPULATION REGARDING USE OF CASH COLLATERAL

THIS MATTER is before the Court on the Debtor, Eagle Properties & Investments LLC's, Motion for Use of Cash Collateral. (Dkt. 62) ("Debtor's Motion"), upon which this Court entered the First Interim Omnibus Order Authorizing use of Cash Collateral (Dkt. 87), the Second Interim Omnibus Order Authorizing use of Cash Collateral (Dkt. 145), the Stipulation Regarding Use of Cash Collateral (Dkt. 212) and the Second Stipulation Regarding Use of Cash Collateral (Dkt. 222) (collectively, the "Cash Collateral Order") which is currently set to expire on November 28, 2023, at 5:00 p.m.; and

UPON AGREEMENT OF THE PARTIES as evidenced by the signatures of counsel set forth below, the Parties desire to continue the terms of the Cash Collateral Order for an additional period of time (the "Supplemental Period") and subject to the budget attached hereto as **Exhibit A** (the "Budget"), with the Supplemental Period commencing at 5:00 p.m. on November 28, 2023, and continuing through 5:00 p.m. on January 31, 2024; and

UPON AGREEMENT OF THE PARTIES, the Debtor shall keep monthly payments current to all secured creditors during the Supplemental Period as set forth in the Budget, and UPON AGREEMENT OF THE PARTIES the terms set forth in the Cash Collateral

Order shall continue through the Supplemental Period with a final hearing on use of cash collateral set for January 23, 2024, at 12:00 p.m. via an in-person hearing.

Date:	/s/ Klinette H Kindred
	The Honorable Klinette H. Kindred
	United States Bankruptcy Court

WE ASK FOR THIS: Entered On Docket: Dec 18 2023

/s Jeffery T. Martin, Jr.

Jeffery T. Martin, Jr., VSB #71860 Martin Law Group, P.C. 8065 Leesburg Pike, Suite 750 Vienna, VA 22182 Jeff@martinlawgroupva.com Counsel for the Debtor

#### SEEN:

/s/ David S. Musgrave

David S. Musgrave, VSB 35327 Gordon Feinblatt LLC 1001 Fleet Street, Suite 700 Baltimore, Maryland 21202 Email: dmusgrave@gfrlaw.com Counsel for Fulton Bank, N.A.

### SEEN:

/s/ Bradley J. Swallow

Bradley J. Swallow, VSB # 32170
Eric S. Schuster, Pro Hoc Vice Admittee
Funk & Bolton
100 Light Street, #1400
Baltimore, Maryland
Email: eschuster@fblaw.com
Counsel for MainStreet Bank

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### /s/ Hannah Hutman

Hannah Hutman, VSB # 79635 Hoover Penrod PLC 342 South Main Street Harrisonburg, VA 22801 mail: hhutman@hooverpenrod.com Counsel for Bank of Clarke County

### SEEN:

## /s/ James R. Meizanis

James R. Meizanis, Jr., VSB # 80692 Blankingship & Keith, P.C. 4020 University Drive, Suite 300 Fairfax, Virginia 22030 Email: jmeizanis@bklawva.com Counsel for Virginia Partners Bank

SEEN and Objected to for the reasons stated in Bala Jain's Response to Motion for the Use of Cash Collateral (Dkt 72) and at the hearings on the Debtor's Motion to Use Cash Collateral held on May 23, 2023 and July 13, 2023:

## /s/ Christopher L. Rogan

Christopher L. Rogan, VSB # 30344 RoganMillerZimmerman, PLLC 50 Catoctin Circle, NE, Suite 300 Leesburg, VA 20176 Email: crogan@RMZLawFirm.com Counsel for Bala Jain LLC

#### LOCAL RULE 9022-1 CERTIFICATION

The undersigned hereby certifies that this proposed order has been signed by all necessary parties.

/s Jeffery T. Martin, Jr.
Jeffery T. Martin, Jr.

#### END OF ORDER

Case 23-10566-	KHK Doc		led 12/18			c Main
Total 13-week 13.500 13.500 3.300 7.600 7.600	7,200 8,200 7,500 4,500 13,500 3,300	19,500 - 12,300 11,700 101,600	cument	109,201	Page 4 of 6 (887) (987)	(1,583) (2,791)
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Eagle Properties and Investments LLC 13-Week Cash Flow Forecast

	7 023 12/20/2023 12/	
13-Week Cash Flow Forecast	5 6 12/6/2023 12/13/2023	
- AA-C	4 11/24/2023	(2,555)
	3 11/17/2023	

lumber inding Date	1 11/3/2023	2 11/10/2023	3 11/17/2023	4 11/24/2023	5 12/6/2023 1	6 12/13/2023 12	7 !/20/2023 12 <sub>/</sub>	8 272023 1	9 /3/2024 1/1	10 0/2024 1/1	11 7/2024 1//	12 1/24/2024 1	13 1/31/2024	Total 13-week
N Port Street Baltimore MD 21224	•			(2,555)										(2,555)
Rider Ln Hummelstown, PA 17036				(1,877)							,		•	(1,877)
2 Williamsburg Koad Kichmond VA 23231 3 Chirch Bd Herchev, DA 17033														
S Grove Ave, Harrisburg PA 17112				(2,277)										(2,277)
Berkstone Dr Harrisburg PA 17112		,	•	(2,173)				,			,	,	•	(2,173)
S Fairville Ave Harrisburg PA 17112				(1,900)										(1,900)
14 Noxbury Nd Gleriwood into 2 if 36 5 Church Rd Hershey PA 17033				(3,652)										(3,652)
N Port Street Baltimore MD 21224		,		(4,235)		•	,			,	,		•	(4,235)
2 Dupont Ave Baltimore, MD 21215 Windover Avenue Vienna VA 22180				(1,809)										(1,809)
ucy Ave Hummelstown PA 17036		,		(948)		,								(948)
W Lombard St Baltimore, MD 21201		,	•	(4,062)		,	,	,		,	,	,	,	(4,062)
) P Street Richmond VA 23223														,
o & 2307 Criairi Briuge na vieriria, v.A.22.161 3 New Oxford Rd. Harrisburg, PA 17112				(2.206)										(2.206)
Jonestown Rd Harrisburg PA 17112		,	,	(2,097)	,	,	,	,	,	,	,	,	•	(2,097)
3 Linglestown Rd, Harrisburg, PA 17112			1	(3,844)		,				,			,	(3,844)
Total Property Tax Disbursements				(47,711)										(47,711)
y Insurance														]
3 Cottage St SW Vienna, VA 22180	(130)			,	(65)	,			(65)					(360)
Lawyers Rd NW Vienna, VA 22180	(141)				(71)				(71)					(583) (583)
I Manning Dr Falmouth, VA 22405	(111)				(23)				(53)					(217) (217)
D E Chocolate Ave Hershey PA 17033					(57)				(57)		,	,	•	(113) M
W Areba Ave Hersney, PA 17033 N Port Street Baltimore MD 21224	(132)				(76) (74)				(76) (74)					e(522)
9 Rider Ln Hummelstown, PA 17036	(-2:)	,		,	(68)	,		,	(68)		,	,		n(137)
2 Williamsburg Road Richmond VA 23231	(179)		,	•	(68)	•	•		(88)	,			•	(357)
3 Church Rd Hershey PA 17033 3 Grove Ave Harrishurd PA 17112		(193)			(2)				(4.)					(153)
Berkstone Dr Harrisburg PA 17112		(339)												(339)
S Fairville Ave Harrisburg PA 17112	- 1	(203)		,	, 9	,			. 6	,	ı	ı		(503)
74 Roxbuly Rd Gleffwood MD 21736 5 Church Rd Hershev PA 17033	(001)				(10)				(10)					g
N Port Street Baltimore MD 21224	(163)	,	,	,	(82)	,	,		(82)	,			•	<b>e</b> (928)
2 Dupont Ave Baltimore, MD 21215	(112)	1		ı	(50)		1	•	(50)	1	ı	•	ı	5(212)
willdover Averiue vierina v.A.zz.rou ucv Ave Hummelstown PA 17036	(861)				(07)				(0/)					(toz)
W Lombard St Baltimore, MD 21201	(142)	,	,	,	(54)	,	,	,	(54)	,	,	,	•	f (052)
) P Street Richmond VA 23223												•	•	6
o & 2567 Chain bridge Rd Vlenna, VA 22181 3 New Oxford Rd, Harrisburg, PA 17112		(109.59)												(110)
Jonestown Rd Harrisburg PA 17112		,		,		,					1	1		, '
3 Linglestown Rd, Harrisburg, PA 17112 I Sterling Rd, Harrisburg, PA 17112		(133.90)												(134)
Total Property Insurance Disbursements	(1,517)	(978)			(1,029)				(1,029)					(4,553)
l and Administrative Disbursements														
ining Fee (Air BnB Properties)	,		(200)	(200)	(200)	(200)	(200)	(200)	(200)	(200)	(200)	(200)	(200)	(5,500)
ies (Air BnB Properties) net (Air BnB Properties)					(110)				(110)					(220)
urity System (Air BnB Properties)		,	,	,	(120)	,	,		(120)	,			•	(240)
n Service (Air BnB Properties)					(180)		1		(180)		ı			(360)
Total General and Administrative Disbursements			(200)	(200)	(1,110)	(200)	(200)	(200)	(1,110)	(200)	(200)	(200)	(200)	(6,720)
ional Fee Disbursements														
O Fee Total Other Dishursements									(250)			(535)		(535)
Otal Other Disput sements									(007)					(000)
Total Disbursements	983	(928)	(200)	(48,211)	(45,946)	(200)	(200)	(200)	(46,196)	(200)	(200)	(200)	(200)	(147,133)

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Prepared by SC&H Group, Inc. on 11/22/2023 at 2:29 PM

Eagle Properties and Investments LLC 13-Week Cash Flow Forecast

Total	13-week					
13	1/31/2024		75,348		(200)	74,848
12	1/24/2024		71,748	4,100	(200)	75,348
11	1/17/2024		68,348	3,900	(200)	71,748
10	1/10/2024		68,848		(200)	68,348
6	1/3/2024		76,244	38,800	(46, 196)	68,848
8	12/272023		72,644	4,100	(200)	76,244
7	12/20/2023		69,244	3,900	(200)	72,644
9	12/13/2023		69,744		(200)	69,244
2	12/6/2023		78,856	36,834	(45,946)	69,744
4	11/24/2023		121,564	5,503	(48,211)	78,856
ဗ	11/17/2023		117,100	4,964	(200)	121,564
2	/10/2023		118,078		(978)	117,100

85,995 31,100 983 118,078

Cash Reconciliation
Beginning Balance
Receipts
Disbursements
Ending Balance

Week Number Week Ending Date

New Oxford Rd. has a variable rate loan.
 The property's insurance is paid yearly.
 The property's insurance is paid yearly.
 The property's insurance is paid yearly.
 Eagle only pays remed through Air Bib IV too. En each of these two properties the utility bill is on average \$200 per month.
 Eagle only pays utilities on the properties rented through Air Bib IV too. En each of these two properties the internet bill is \$55 per month.
 Eagle only pays for internet on the properties rented through Air Bib IV too. En each of these six properties the internet bill is \$55 per month.
 Eagle only pays for a security system on the properties rented through Air Bib IV tho. En each of the six properties has to be mowed every other week and cost \$45 per month.
 Eagle only pays for lawn care on the properties rented through Air Bib IV tho. Each of the six properties has to be mowed every other week and cost \$45 per month.

NOTES:

1/ This property is currently vacant.

3/ Property abandoned by estate.